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FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

AUG 15 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of:

Geographic Partitioning and Spectrum
Disaggregation by Commercial Mobile
Radio Services Licenses

WT Docket No. 96-148

Implementation of Section 257 of the
Communications Act -
Elimination of Market Entry Barriers

GN Docket No. 96-113

DOCKET FILE COPY ORIGINAL

Comments of the United States Telephone Association

The United States Telephone Association (USTA) respectfully submits these initial comments in response to the Notice of Proposed Rulemaking in the above-referenced docket.¹ USTA is the principal trade association of the local exchange carrier (LEC) industry, and represents over 1100 members, including many PCS licensees and rural telephone companies.

INTRODUCTION AND SUMMARY

USTA supports the Commission's proposals to expand geographic partitioning and spectrum disaggregation to all eligible carriers. Many USTA members were successful bidders in the recent PCS auctions, and would deploy service to the public more rapidly under Commission rule changes which enhance the ability of those members to raise capital for the construction of PCS systems. In particular, where rural telephone companies have won licenses, the ability to partition areas to other qualifying entities will provide those companies with

¹Notice of Proposed Rulemaking, WT Docket No. 96-148, GN Docket No. 96-113, FCC 96-287 (July 15, 1996) ("Notice").

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additional capital which will facilitate the build-out of PCS systems in rural areas. Also, USTA believes that in many cases the ability of rural telephone companies to obtain partitioned licenses for areas not directly related to their local service area will enhance their ability to participate in broadband PCS. The ability to partition larger service areas will in many cases strengthen the business case for deploying PCS in rural areas. At the same time, the Commission should be careful that expanded use of partitioning does not undermine the Notice's goal of increasing the amount of capital available to smaller entities, and/or to deploy service in rural areas.

In some cases, rural telephone companies will not be able to participate in broadband PCS within their service area where competition results in significant increases in the cost of partitioned licenses (or disaggregated spectrum). See generally, Fifth Report and Order, PP Docket 93-253, 9 FCC Rcd 5532 (July 15, 1994)("Fifth Report and Order"). Evidence from recent spectrum auctions demonstrates that where more than one entity desires the spectrum in a particular area, rural telephone companies are likely to be financially excluded from obtaining spectrum to serve their traditional service areas.

Particularly where a competing PCS provider represents competition for traditional local services, and can obtain services and unbundled elements at prices which do not contribute to the historical costs of the network, see First Report and Order, CC Docket 96-98, FCC 96-325 (August 8, 1995), a rural telephone company may be unable to financially justify participation in broadband PCS where the price of spectrum is inflated. Moreover, in some circumstances, maintaining the network infrastructure in these rural areas will no longer be supported by government subsidies, but must be facilitated by the rural company's expansion into new services, including wireless services.

Such expansion into new services should not be inhibited by the Commission's spectrum policies, especially in light of the fact of the Congressional mandate of Section 309(j), which specifically mentions rural telephone companies (as distinct from small businesses generically). See 47 U.S.C. § 309(j). Accordingly, in order to fulfill the statutory mandate to promote

participation by such companies, USTA suggests that entities qualifying as “rural telephone companies,” under Section 1(37) of the Communications Act be given a “right of first refusal” for a partitioned license covering their existing telephone service area. See 47 U.S.C. § 153(37).

Partitioned licenses which do not fall along county lines should be granted a waiver of that requirement where the parties can demonstrate that the proposed partitioned area deviates from county lines in order to include a related community of interest, to promote efficiencies through the use of existing network infrastructure, or where the partitionee seeks to combine the partitioned area with an adjacent license. USTA agrees that there should be limitations on transferability within the entrepreneur’s blocks (C and F blocks), although entrepreneurs should not forfeit the benefits of their bidding preferences if they choose to raise capital by partitioning. Also, there should be no limit on the size of the partitioned license, provided that partitionees are required to satisfy the same construction requirements as the original licensee. Liberalized partitioning should not permit licensees to avoid their obligations to build-out their networks and thereby underserve rural areas.

DISCUSSION

I. The Commission’s Proposals to Expand Eligibility for Partitioned Licenses Will Serve Its Goals to Increase Participation by Small Businesses

The Notice states that the Commission’s goals in this proceeding are to enable a wide variety of broadband PCS applicants, including small businesses, rural telephone companies, and businesses owned by minorities and women, to overcome entry barriers through the creation of smaller, less capital-intensive licenses, and to provide a means for increased access to capital that can be used to construct and maintain PCS systems. See Notice, para. 11.

USTA agrees that these goals would be served by permitting licensees to partition licenses of any size geographic area to any qualifying entity. Many small businesses, including rural telephone companies, would be better served by partitioning licenses which may not relate to a telephone company service area or which are substantially larger than the 200% of the

service area presumed reasonable under the existing rules. See Competitive Bidding Fifth Report and Order, 9 FCC Rcd 5532, 5597-99; Notice, para. 5, n.12. Where a small and/or rural telephone company can offer a larger service area, or a service area with more concentrated demand, their PCS venture may have a greater chance of financial success.²

USTA members of all sizes were successful bidders in recent PCS auctions. These LECs may desire to partition off part of their MTA or BTA service area (or disaggregate a portion of their spectrum) in order to raise capital for PCS network deployment. This is particularly true where telephone companies are facing increased competition in core service areas, and may be required by their states to offer services and network elements at prices which do not reflect the full embedded cost of the network. See, e.g., First Report and Order, CC Docket 96-98, FCC 96-325 (August 8, 1996) ("Interconnection Order"). Consequently, permitting these licensees to partition or disaggregate will further the Commission's goal of rapid deployment of PCS services. See Notice, para. 20.

II. Pursuant to the Congressional Mandate, the Commission Should Adopt a Limited Right of First Refusal for Rural Telephone Companies

The Notice requests comment on whether the Commission's proposals will lessen rural telcos' ability to participate in the provision of broadband PCS. Notice, para. 17. As a general matter, the Commission's proposals will in fact increase rural telcos' ability to participate in broadband PCS, by enabling them to obtain partitioned licenses outside of, or substantially larger than, their existing service area. Accordingly, USTA supports the Commission's proposal.

The Notice also tentatively concludes that to the extent that other entities may also be interested in bringing service to underserved rural communities, these rules should facilitate

²Granting rural telephone companies the flexibility to tailor the size of the service area to the needs of the market is consistent with the Commission's prior finding that many rural telephone companies would not be able to justify the investment needed to construct a PCS system in a full-sized MTA. See Fifth Report and Order, para. 150.

competition in these areas. But, as the Telecommunications Act of 1996 recognizes, competition in rural areas does not always translate into lower prices and greater services to the public. See, e.g., 47 U.S.C. § 251(f). In some rural areas, competition for partitioned licenses could put broadband PCS outside the reach of rural telephone companies.

Where another entity provides PCS service in a rural area and obtains interconnection at rates similar to the Commission's recommended proxy rates adopted in the Interconnection Order, some rural telephone companies will not be advantaged by any efficiencies gained by their existing infrastructure.³ Yet these efficiencies were the original basis of the Commission's partitioning rules for rural telephone companies in the Fifth Report and Order. Additionally, many rural telephone companies recognize that the revenues for traditional local service will no longer support the costs of deploying and maintaining the existing wireline network, as implicit subsidy mechanisms are removed from the rates for these services. In addition to the explicit subsidy mechanism currently being developed by a Federal-State Joint Board, see, e.g., 47 U.S.C. § 254, rural telephone companies expect to support the provision of basic service and needed network modernization through expansion into new services, including PCS. These recent rule changes require that competition be introduced cautiously in rural areas..

Consequently, USTA proposes that entities qualifying as rural telephone companies be given an option to either participate in PCS by obtaining a partitioned PCS license of any size through normal negotiations, or by exercising a "right of first refusal" to obtain the right to obtain a partitioned license covering their service area, at a "per-pop" price equal to that offered by the competing PCS provider. The parties applying to the Commission for a partitioned license would be required to notify the rural telephone companies within the partitioned license

³While the Act provides that "rural telephone companies" are exempt from such pricing rules until they receive a bona fide request, and a State Commission approves the request, 47 U.S.C. § 251(f)(1), it is likely that many such requests from PCS providers will be approved.

area.⁴ The partitioned license would only be granted upon a showing that the rural telephone company declined to exercise its right of first refusal, with respect to a final offer.

Of course, just as such rights are exercised in the normal course of business, the refusal of an initial offer does not excuse the seller from their obligation to present the rural telephone company with a new offer if a lower price is also offered to another prospective buyer. Rural telephone companies could exercise such right only once - that is, such rights would not accrue where the rural telephone company already obtained a partitioned license (whether 30 MHz or 10 MHz) or had previously exercised its right of first refusal.⁵

This proposal will serve the public interest by furthering the Congressional mandate to promote the dissemination of licenses to rural telephone companies, and by ensuring that the Commission's proposals to liberalize the partitioning and spectrum disaggregation rules do not create a barrier to entry for certain small rural telephone companies. As the Commission notes, the creation of smaller, less capital-intensive licenses within the reach of smaller entities will enable those entities to overcome other entry barriers. See Notice, para. 14. Permitting rural telephone companies to elect to obtain smaller, less-capital intensive licenses limited to their existing service area will further the participation of those rural companies in broadband PCS.

III. The Commission Should Not Limit the Size of a Partitioned License, But Should Adopt its Proposals to Impose Construction Obligations on License Partitionees

The Notice requests comment about several issues related to implementation of the new partitioning rules, including defining the boundaries of partitioned licenses. The Notice

⁴Subject to this additional provision, USTA supports the proposed licensing rules described in the Notice. The evidence of notice to the existing local telephone company could be included with the FCC Form 490. See Notice, para. 60.

⁵Of course, a rural telephone company who already purchased a partitioned license through normal negotiations would also not have a right of first refusal available.

tentatively concludes to require partitioned licenses to follow county line boundaries, and requests comment on what criteria would justify a waiver of that requirement. Notice at para. 18.

Partitioned licenses which do not fall along county lines should be granted a waiver of that requirement where the parties can demonstrate that the proposed partitioned area deviates from county lines in order to include a related community of interest, to promote efficiencies through the use of existing network infrastructure, or where the partitionee seeks to combine the partitioned area with an adjacent license. In many cases, the efficiencies of utilizing county lines (which correlate to the MTA and BTA boundaries utilized in the Commission's licensing database) may be outweighed by the benefits to the public interest obtained by arranging a service area which more closely relates to established patterns of service demand, available infrastructure, or available spectrum.

USTA agrees that there should be limitations on transferability within the entrepreneur's blocks (C and F blocks), and supports the Commission's proposals to avoid unjust enrichment by requiring licensees who have benefitted from special bidding procedures to partition licenses only to parties who qualify for such benefits. See Notice, para. 20. However, "entrepreneurs" who sell a partitioned license to similarly qualified applicants should not be required to repay a portion of the balance owed under an installment payment plan. See Notice, para. 21. The partitioning arrangement in no way lessens the Commission's expectations for payment from their status at the time the license was won at auction. At the same time, not requiring such payments would further the Commission's goal of providing licensees with a funding source which will enhance their ability to build-out their systems. Notice, para. 20.

Also, partitionees will have fully compensated the licensee for the value of their partitioned license, and the price charged by the licensee will take into account its installment payment obligations. It would therefore be unfair to the partitionee to require the partitionee to

guarantee payment of a portion of the partitioner's obligation. Notice, para. 22.⁶ Similarly, the original licensee should not have any continuing obligation with respect to the partitioned area under FCC regulations, although the parties could arrange for such obligations through private management contracts.

The Notice requests comment regarding limits on the size of the partitioned area. Notice, para. 19. There should be no limit on the size of the partitioned license, provided that partitionees are required to satisfy the same construction requirements as the original licensee. Liberalized partitioning should not permit licensees to avoid their obligations to build-out their networks and thereby underserve rural areas. The Commission should adopt its proposed options for modifying the construction requirements, with the terms dependent upon whether the five-year build-out requirement has been met. See Notice, para. 33-34.

CONCLUSION

USTA applauds the Commission for undertaking creative and progressive rule changes to increase participation by smaller entities in broadband PCS. The recent PCS auctions have for the most part, placed license ownership out of range of the financial means of all but the largest, most heavily-financed companies, contrary to the Congressional mandate to disseminate licenses to a wide variety of entities, including small businesses and rural telephone companies. Expanded use of the partitioning mechanism will enhance the ability of smaller concerns to provide broadband PCS service to the public.

At the same time, in order to ensure continued effectiveness of the original partitioning rules for rural telephone companies, the Commission should adopt USTA's proposal for a

⁶This is consistent with the existing practice of awarding the partitionee a separate license for the defined area. Thus, the partitionee is not affected by any default or failure to comply with the rules occasioned by the original licensee. The potential that a partitionee might be held liable for acts of the original licensee not within its control would stifle incentives to partition and undermine the Commission's objectives of lowering entry barriers into the PCS market.

limited "right of first refusal" for rural telephone company service areas. Fulfillment of new goals to remove entry barriers for smaller entities should not erect new barriers for rural telephone companies, or undermine the general goal of providing rural telephone companies and other small businesses with increased access to capital.

Respectfully submitted,

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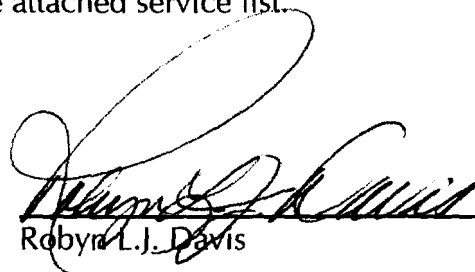
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CERTIFICATE OF SERVICE

I, Robyn L.J. Davis, do certify that on August 15, 1996 comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.



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